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ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.

**MSTV**

Julian L. Shepard  
Vice President and General Counsel

July 26, 1993

1400 16th Street NW  
Suite 610  
Washington, DC 20036

**BY HAND DELIVERY**

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**JUL 26 1993**

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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Allocation of the 219-220 MHz Band for Use by Amateur Radio Service  
ET Docket No. 93-40, Notice of Ex Parte Presentation

Dear Mr. Caton:

The Association for Maximum Service Television, Inc. ("MSTV"), pursuant to Section 1.1206(a)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(2), hereby notifies the Commission that Victor Tawil, Vice President of MSTV, met with Mr. David Siddall of the Commission's Office of Engineering and Technology today. The attached letter was delivered to Mr. Siddall during the meeting. The substance of the matters discussed is reflected in this letter as well as MSTV's submissions on file with the Commission.

Please direct any inquiries concerning this matter to the undersigned.

Sincerely,

*Julian L. Shepard*  
Julian L. Shepard

cc: Mr. Tom Derenge

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Mr. David Siddall  
Office of Engineering and Technology  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Victor Tawil  
Vice President

Re: Allocation of 219-220 MHz Band for Use by Amateur Radio  
Service, ET Docket No. 93-40, Ex Parte Presentation

Dear Mr. Siddall:

The Association for Maximum Service Television ("MSTV") is a trade association representing over 250 commercial and noncommercial broadcast television stations throughout the United States on issues relating to the technical quality of the broadcast signal. MSTV has followed this proceeding, which proposes to allocate the 219-220 MHz band on a secondary basis to amateur auxiliary station packet networks, because of the potential for interference to adjacent-channel broadcast television operations.

MSTV opposed the American Radio Relay League's ("ARRL") petition for rulemaking seeking a secondary allocation of the entire 216-220 MHz band to these amateur operations. Such an allocation would have posed a significant risk of adjacent-channel interference to television broadcast stations operating on Channel 13 and Channel 11. MSTV is thus heartened by the Commission's finding that it is not feasible to allow amateur use of the 216-218 MHz band, as well as its decision to impose power limits and other interference safeguards on amateur packet networks that may utilize the 219-220 MHz band.

MSTV also supports proposed Section 97.303(r)(1) which states in part that "No amateur station transmitting in the 219-220 MHz segment shall cause harmful interference to, nor is protected from interference due to operation of . . . broadcast television channels 11 and 13. . . ." While ARRL urges the Commission to delete this requirement in comments filed on June 15, 1993, claiming that compliance with Section 97.307's spectrum purity standards is sufficient, this provision is necessary to ensure that the proposed amateur operations do not interfere with reception of television broadcasting.

Sincerely,

A handwritten signature in dark ink, appearing to read "Victor Tawil". The signature is fluid and cursive, with a long horizontal stroke at the end.

Victor Tawil